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1155 AVENUE OF THE AMERICAS, NEW YORK, NY 10036-2711

November 18, 2022

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VIA ECF AND EMAIL

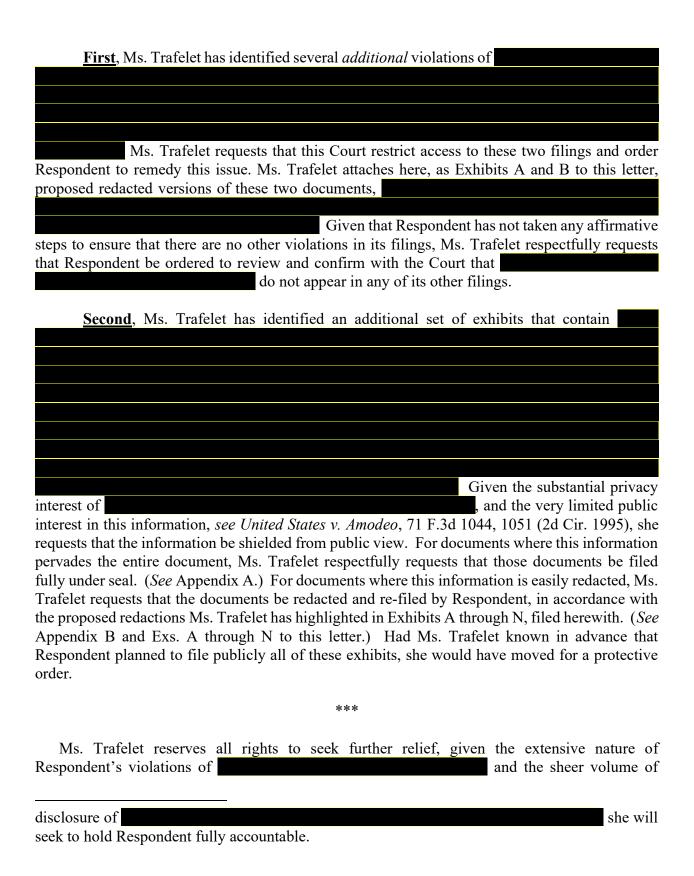
The Honorable Analisa Torres United States District Court Southern District of New York 500 Pearl St. New York, NY 10007 Torres_NYSDChambers@nysd.uscourts.gov

Re: Lara S. Trafelet v. Cipolla & Co., LLC, No. 22-cv-4888 (AT) (VF)

Dear Judge Torres:
We represent Petitioner Lara S. Trafelet in the above-referenced matter. We are writing in furtherance of our November 14 letter (ECF No. 54) to seek the Court's immediate assistance to restrict public access to certain additional documents Respondent filed (<i>see</i> Appendices A and B). Upon further review, these documents contain
Once restricted, we respectfully request that the Court order the Respondent to (i) file the exhibits listed in Appendix A fully under seal; and (ii) file redacted versions of the exhibits and documents listed in Appendix B, in accordance with the (limited)
redactions that Ms. Trafelet has proposed in Exhibits A through N to this letter.
As noted in our November 14 letter, Ms. Trafelet has undertaken a review of Respondent's filings to ensure that
She appreciates the Court's prompt assistance in response to that letter. Ms. Trafelet has now completed her review of Respondent's 108 exhibits
and other redacted filings and respectfully requests further relief from the Court. 1
¹ Ms. Trafelet undertook the review, at her own expense, of all of Respondent's filings, totaling
several thousand pages, despite the fact that the burden should have been on Respondent to review
its own filings

Respondent has neither alerted this Court nor Ms. Trafelet to further violations, which remain accessible to the public. Should any harm materialize from the public

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documents Respondent filed

. She sincerely appreciates the Court's prompt attention to

this matter.

We are available should Your Honor have any questions.

Respectfully submitted,

/s/ Jenna E. Ross

Jenna E. Ross Jenner & Block LLP Counsel for Petitioner Lara S. Trafelet

cc: Counsel for Respondent (via ECF and email)

GRANTED. The Clerk of Court is directed to modify the viewing level of the following documents to allow only the parties to access them: ECF Nos. 41, 42, 43, 45-03, 45-04, 45-07, 45-08, 45-23, 45-25, 45-26, 45-30, 45-33, 45-34, 45-35, 45-36, 45-39, 45-44, 45-45, 45-49, 45-51, 45-62, 45-68, 45-76, 45-81, 50-09, 50-10, 50-15, 50-17, 50-18, 50-19, 50-22, 50-25.

Further:

- 1. Respondent is directed to file under seal the exhibits identified by Petitioner in Appendix A to Petitioner's letter motion at ECF No. 56.
- 2. Respondent shall also file redacted versions of the exhibits and documents identified by Petitioner in Appendix B to Petitioner's letter motion at ECF No. 56, in accordance with the redactions Petitioner proposed in Exhibits A through N to Petitioner's letter motion at ECF No. 56.
- 3. Respondent is directed to review its filings and confirm with the Court by **November 23, 2022**, that the sensitive information identified by Petitioner does not appear in any of its other filings.

SO ORDERED.

Dated: November 18, 2022 New York, New York

ANALISA TORRES United States District Judge